



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Donald R. Schregardus
Director

FACSIMILE INFORMATION

SEND TO: John Love PHONE # _____

COMPANY NAME: USEPA/PCB Control Section

FACSIMILE NUMBER RECEIVING INFO: _____

FROM: Tom Buchan

- 614-644-3196 (ER)
- 614-644-3042 (SIU)
- 614-644-3063 (PCB) 4-3068
- 614-644-2924 (DERR)
- 614-644-2260 (SERC/RTK)

FACSIMILE NUMBER SENDING INFO: 614-644-3250

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SPECIAL INSTRUCTIONS: _____

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NOTE TO RECEIVER: Info on Marion Steel



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EMERGENCY
& HAZARDOUS
WASTE
SECTION

MARLIE
Please track
this case
Ray
7/13/93

93 JUL -6 PM 2:11

RECEIVED

REPLY TO THE ATTENTION OF:
SP-14J

JUN 29 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James R. Conway, President
Marion Steel Company
912 Cheney Avenue
Marion, Ohio 43302

Re: PCB Spill

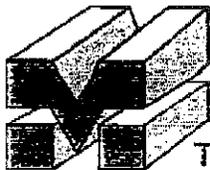
Dear Mr. Conway:

This letter pertains to the PCB spill at your facility documented during an inspection on July 7, 1989 by the Ohio Environmental Protection Agency (OEPA).

During the inspection, a sample was collected by the inspector from an oily area beneath the south capacitor bank in the main substation. Results of analyses showed the sample contained 86,000 ppm PCBs. In a letter dated July 21, 1989 from OEPA, Marion Steel was advised of these results and instructed to clean the soil to 25 ppm PCBs and clean any affected solid surfaces to 100 ug/100 cm². Marion Steel was also forwarded a copy of the National Spill Response Policy and advised to document the cleanup as required by the policy.

In a letter dated July 26, 1989 to OEPA, Marion Steel stated that the cleanup was completed. Marion Steel stated further that to confirm PCBs were totally removed, two samples of soil in the cleanup area would be sent out for testing. On August 8, 1989 Marion Steel reported the results of analyses on these two samples to be 1360 ppm and 4500 ppm PCBs. However, Marion Steel felt these results were questionable because of the type of Aroclor identified.

On August 31, 1989 representatives from OEPA returned to Marion Steel and collected a soil sample from the cleanup area. The results of analyses on this sample showed 210 ppm PCBs. These results were forwarded to Marion Steel with instructions to remove additional soil.



THE MARION STEEL COMPANY 912 CHENEY AVENUE MARION, OHIO 43302

614-383-4011

FAX: 614-383-6429

RECEIVED
JUL 7 1993

JUL 7 1993

RECEIVED

July 7, 1993

Ms. Charlotte Hammar
Division of Emergency and Remedial Response
Ohio Environmental Protection Agency
P. O. Box 1049
1800 WaterMark Drive
Columbus, Ohio 43266-0149

Re: Follow up sampling from previous PCB Fluid
Spill in the Plant Main Substation

Dear Mrs. Hammar:

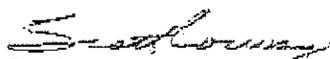
We apologize for the misunderstanding which took place involving the post sampling of the July 1989 remediation project. As discussed in our December meeting, we were under the impression from EPA inspector Kelly Sherman that our results were satisfactory to the E.P.A.

Additionally, in January 1993 we re-initiated a complete sampling plan and discovered a presence of PCB contamination in the area below the capacitor bank greater than 25 ppm. Another remediation plan was implemented on June 24 of 1993 by Cousins Environmental Services. We believe that this clean up effort rendered the affected area completely free from PCB contamination.

Please find the enclosed amended Clean up Document and attached Cousins report involving this incident.

Please don't hesitate to call if you have any question or concerns about this information or if you wish to schedule a follow up visit to resample the area in question.

Sincerely,


Scott D. Conway
Plant Manager

COUSINS

Waste Control • Environmental Services • Dust Control
PROVIDING QUALITY SERVICES SINCE 1971

1801 Matzinger Road
Toledo, Ohio 43612
(419) 729-1500 • (800) 433-8754

SALES FAX:
(419) 729-8501

MAIN FAX:
(419) 729-8507

ENVIRONMENTAL FAX:
(419) 729-8506

June 25, 1993

Mr. Scott Conway
Marion Steel Company
912 Cheney Ave.
Marion, Ohio 43302

Re: Remediation of PCB spill area.

Dear Mr. Conway:

On May 4, 1993, Cousins personnel arrived at the spill site for the specific purpose of collecting samples to quantify the extent of the contamination caused by the spill. This spill occurred underneath a small capacitor bank within the plant substation. The area under the capacitor bank was sectioned off for the purpose of establishing a sampling grid. A schematic of the spill area and the collection points of the samples is attached in Appendix A. Samples were taken at the corners of the four boxes at depth intervals of surface, one foot, and two foot. A sample was taken directly beneath the capacitor bank at the depth of one foot. The capacitor bank supports are resting on a concrete slab at a depth of one foot below the surface. The slab is represented in the schematic as the dotted line.

The results of the analysis are enclosed in Appendix B. From the results of the analysis the area to be remediated was determined. On June 24, 1993, Cousins personnel returned to the site to complete the remediation. The remediation consisted of excavating the contaminated soils beneath the capacitor bank from the surface to the top of the concrete support slab. The extent of the excavation is shown in the schematic in Appendix A. After the excavation, the slab was inspected for the presence of cracks. This inspection revealed that the slab did not have any cracks, thus there is no reason to believe that the contamination went any further. The excavation generated six drums of PCB contaminated waste which were properly labeled and staged for disposal. The maintenance staff at the site provided the clean backfill for the excavation.

Thank you for allowing us to serve your company by completing this spill cleanup. Please contact me if Cousins can be of any further assistance with your environmental needs.

Respectfully,

Bruce W. Hartzell

Bruce W. Hartzell
Project Manager



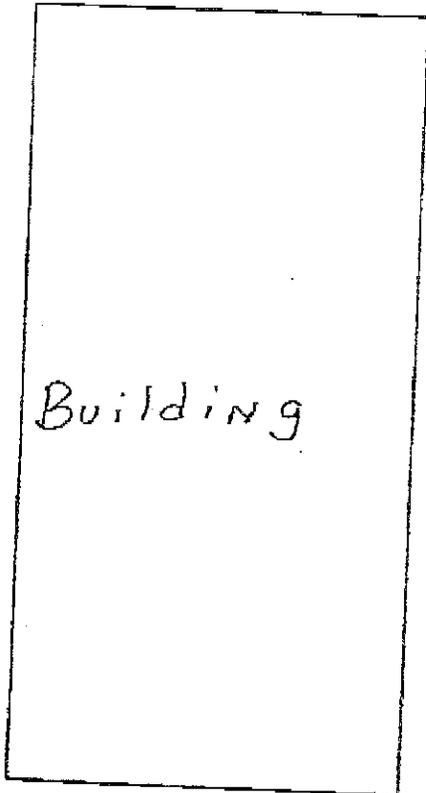


APPENDIX A

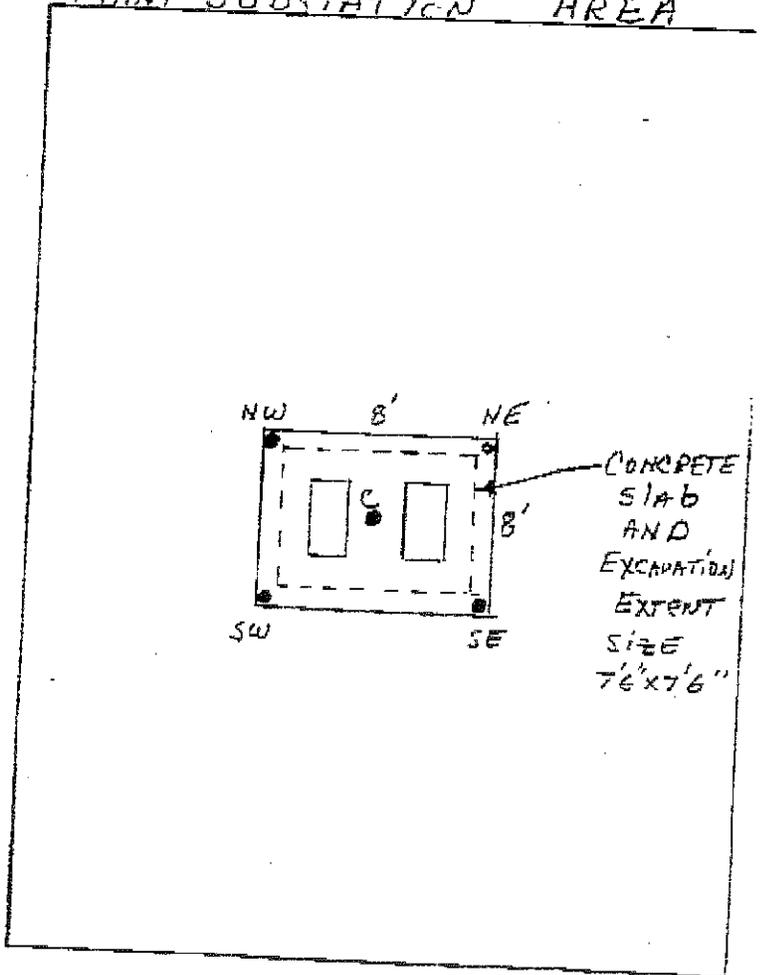


C
H
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E
Y

A
V
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PLANT SUBSTATION AREA



● = SAMPLING POINTS

APPENDIX B



47930 West Road • Wixom, Michigan 48393
Phone: (313) 624-3090 • Fax: (313) 624-3095

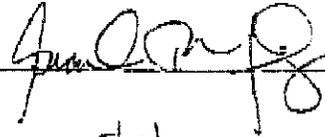
To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Eagle Report Number: 1281
Eagle Sample ID: EL03783

Date: 05/17/93

Sample Description: C-S1 SURF, Marion Steel, Marion, Ohio

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analyst
PCB Analysis							
ARO 1016	1400	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB

Reviewed by 
Date 5/17/93



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To: COUSINS ENVIRONMENTAL SERVICES
 1801 Matzinger Road
 Toledo, OH 43612

Eagle Report Number: 1281
 Eagle Sample ID: EL03784

Date: 05/17/93

Sample Description: Marion Steel, Marion, Ohio SE2-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analyst
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/16/93	NMB
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/16/93	NMB
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/16/93	NMB
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/16/93	NMB
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/16/93	NMB
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/16/93	NMB
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/16/93	NMB

Reviewed by

[Handwritten Signature]

Date

5/17/93



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To: COUSINS ENVIRONMENTAL SERVICES
 1801 Matzinger Road
 Toledo, OH 43612

Eagle Report Number: 1281
 Eagle Sample ID: EL03785

Date: 05/17/93

Sample Description: Marion Steel, Marion, Ohio SE1-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analyst
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/14/93	NNB
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NNB
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NNB
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NNB
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NNB
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NNB
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NNB

Reviewed by *[Signature]*

Date 5/17/93



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To: COUSINS ENVIRONMENTAL SERVICES
 1801 Matzinger Road
 Toledo, OH 43612

Eagle Report Number: 1281
 Eagle Sample ID: EL03786

Date: 05/17/93

Sample Description: Marion Steel, Marion, Ohio SE5-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analyst
PCB Analysis							
ARO 1016	0.42	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB

Reviewed by

Juan Carlos

Date

5/17/93



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To: COUSINS ENVIRONMENTAL SERVICES
 1801 Matzinger Road
 Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281

Eagle Sample ID: EL03787

Sample Description: Marion Steel, Marion, Ohio SW5-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analysis
PCB Analysis							
ARO 1016	0.57	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB

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[Handwritten Signature]

Date

5/17/93



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To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Eagle Report Number: 1281

Eagle Sample ID: ELO3788

Date: 05/17/93

Sample Description: Marion Steel, Marion, Ohio SW1-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analyst
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB

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[Handwritten Signature]

Date

5/17/93



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To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Eagle Report Number: 1281

Eagle Sample ID: EL03789

Date: 05/17/93

Sample Description: Marion Steel, Marion, Ohio SW2-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analyst
PCB Analysis							
ARO 1016	Not det	mg/L		1.0	SW846 8080	05/14/93	NMB
ARO 1221	Not det	mg/L		1.0	SW846 8080	05/14/93	NMB
ARO 1232	Not det	mg/L		1.0	SW846 8080	05/14/93	NMB
ARO 1242	Not det	mg/L		1.0	SW846 8080	05/14/93	NMB
ARO 1248	Not det	mg/L		1.0	SW846 8080	05/14/93	NMB
ARO 1254	Not det	mg/L		1.0	SW846 8080	05/14/93	NMB
ARO 1260	Not det	mg/L		1.0	SW846 8080	05/14/93	NMB

Reviewed by _____

Date _____

[Handwritten Signature]
5/17/93



47930 West Road - Wixom, Michigan 48393
Phone: (313) 624-3090 - Fax: (313) 624-3095

To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03790

Sample Description: Marion Steel, Marion, Ohio NE2-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analyst
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB

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[Handwritten Signature]

Date

5/17/93



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Phone: (313) 624-3090 • Fax: (313) 624-3095

To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Eagle Report Number: 1281

Eagle Sample ID: EL03789

Date: 05/17/93

Sample Description: Marion Steel, Marion, Ohio SW2-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analyst
PCB Analysis							
ARO 1016	Not det	mg/L		1.0	SW846 8080	05/14/93	NMB
ARO 1221	Not det	mg/L		1.0	SW846 8080	05/14/93	NMB
ARO 1232	Not det	mg/L		1.0	SW846 8080	05/14/93	NMB
ARO 1242	Not det	mg/L		1.0	SW846 8080	05/14/93	NMB
ARO 1248	Not det	mg/L		1.0	SW846 8080	05/14/93	NMB
ARO 1254	Not det	mg/L		1.0	SW846 8080	05/14/93	NMB
ARO 1260	Not det	mg/L		1.0	SW846 8080	05/14/93	NMB

Reviewed by

[Handwritten Signature]

Date

5/17/93



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To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03790

Sample Description: Marion Steel, Marion, Ohio NE2-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analyst
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB

Reviewed by

[Handwritten Signature]

Date

5/17/93



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Phone: (313) 624-3090 • Fax: (313) 624-3095

To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Eagle Report Number: 1281
Eagle Sample ID: EL03791

Date: 05/17/93

Sample Description: Marion Steel, Marion, Ohio NE1-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analyst
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB

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[Handwritten Signature]

Date

5/17/93



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To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Eagle Report Number: 1281

Eagle Sample ID: EL03792

Date: 05/17/93

Sample Description: Marion Steel, Marion, Ohio NES-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analyst
PCB Analysis							
ARO 1016	0.50	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB

Reviewed by

James P. [Signature]

Date

5/17/93



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Phone: (313) 624-3090 • Fax: (313) 624-3095

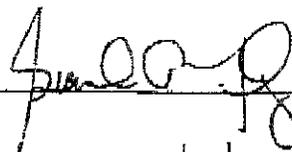
To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03793

Sample Description: Marion Steel, Marion, Ohio NW2-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analyst
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB

Reviewed by 
Date 5/17/93



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To: COUSINS ENVIRONMENTAL SERVICES
 1801 Matzinger Road
 Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
 Eagle Sample ID: EL03794

Sample Description: Marion Steel, Marion, Ohio NW1-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analyst
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB

Reviewed by

[Handwritten Signature]

Date

5/17/93



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Phone: (313) 624-3090 • Fax: (313) 624-3095

To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03795

Sample Description: Marion Steel, Marion, Ohio NW5-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analyst
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB

Reviewed by

[Handwritten Signature]

Date

5/17/93